

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MELODY JOY CANTU and DR.)
RODRIGO CANTU ,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) NO.: 5:20-CV-00746-JKP
DR. SANDRA GUERRA and) (HJB)
DIGITAL FORENSICS)
CORPORATION, LLC,)
)
Defendants.)

ORAL AND VIDEOTAPED DEPOSITION OF

DR. RODRIGO CANTU

(VIA ZOOM)

JULY 16, 2022

ORAL AND VIDEOTAPED DEPOSITION OF DR. RODRIGO CANTU,
produced as a witness at the instance of the DEFENDANT,
and duly sworn, was taken in the above-styled and
numbered cause on July 16, 2022 from 2:24 o'clock p.m.
to 5:40 o'clock p.m., Via Zoom, before
DEBBIE S. LONGORIA, CSR in and for the State of Texas,
reported by machine shorthand, pursuant to the Federal
Rules of Civil Procedure.

A P P E A R A N C E S

FOR THE PLAINTIFFS:

TOR EKELAND (Via Zoom)
TOR EKELAND LAW, PLLC
30 WALL STREET, 8TH FLOOR
NEW YORK, NEW YORK 10005
(718) 737-7264
tor@torekeland.com

FOR THE DEFENDANTS DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC:

BRANDY C. PEERY (Via Zoom)
RICARDO G. CEDILLO (Via Zoom)
DAVIS, CEDILLO & MENDOZA, INC.
755 E. MULBERRY, SUITE 500
SAN ANTONIO, TEXAS 78212
(210) 822-6666
bpeery@lawdcm.com
rcedillo@lawdcm.com

ALSO PRESENT:

KYLE LABYER, Videographer (Via Zoom)
MELODY JOY CANTU (Via Zoom)
NICOLE GUITELMAN (Via Zoom)
KATHLEEN N. FOLKS (Via Zoom)
DR. SANDRA GUERRA (Via Zoom)

1	INDEX	
2		PAGE
3	Appearances.....	2
4	DR. RODRIGO CANTU	
5	Examination by Ms. Peery.....	4
6	Reporter's Certificate.....	100
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 they just come on suddenly and unexpectedly?

2 MR. EKELAND: Objection. You can answer.

3 THE WITNESS: Sometimes there's sort of a
4 buildup, that she can feel it coming. Sometimes that

05:07 5 buildup is longer, sometimes it's shorter.

6 Q. (By Ms. Peery) Have you ever witnessed Melody
7 experiencing a panic attack in public?

8 MR. EKELAND: Objection. You can answer.

9 THE WITNESS: She's felt very anxious and
05:08 10 feeling like a panic attack was coming on. We've had to
11 leave places in pub -- that are public restaurants,
12 stores.

13 Q. (By Ms. Peery) How often do you and Melody go
14 out to restaurants in a given week?

05:08 15 A. Less than one.

16 Q. Do you go on any vacations together?

17 A. We have gone on vacation together.

18 Q. When is the last vacation that you and Melody
19 went on?

05:08 20 A. I think it was last -- last year, I think.

21 Q. Okay. Where did you go?

22 A. We went to Hawaii.

23 Q. And which island?

24 A. The big island, Hawaii.

05:09 25 Q. Was it just you and Melody or did any of her

1 children go?

2 A. Her children did not go.

3 Q. Okay. Was it just the two of you?

4 A. Yes.

05:09 5 Q. How long did you stay in Hawaii?

6 A. It was less than a week, maybe five days.

7 Q. Okay. Where did you stay?

8 A. We stayed at, I think it was a condo, on the
9 west side of the island.

05:09 10 Q. Who made the travel arrangements?

11 A. I mean, I think I made some of them, she made
12 some of them. I think she found the condo and I think I
13 did the airline. I don't recall.

14 Q. What did you do in Hawaii?

05:10 15 A. We --

16 MR. EKELAND: Objection. You can answer.

17 THE WITNESS: Okay. We did some
18 sightseeing.

19 Q. (By Ms. Peery) Did Melody's agoraphobia affect
05:10 20 your vacation at all?

21 MR. EKELAND: Objection. You can answer.

22 THE WITNESS: There -- there was a day or
23 two where she didn't want to go anywhere after the --
24 like we had a planned sightseeing. We went to go look
05:10 25 at an octopus farm. And afterwards, we were going to go

1 to dinner or do something else and she -- she didn't
2 want to go, she felt anxious to be out. So, there
3 were -- there were some -- some episodes of that.

4 Q. (By Ms. Peery) Was there any episodes of the
05:11 5 panic disorder agoraphobia that affected her during the
6 flight from Texas to Hawaii?

7 MR. EKELAND: Objection. You can answer.

8 THE WITNESS: I don't believe she had a
9 panic attack.

05:11 10 Q. (By Ms. Peery) Prior to your Hawaiian vacation
11 in 2021; is that correct?

12 A. Yes.

13 Q. Okay. When was your last vacation prior to
14 your Hawaiian vacation?

05:11 15 A. I don't recall, maybe two years before that.
16 I don't remember.

17 Q. Okay. So, your complaint provides that on
18 May 14th, 2018 you contacted Melody and told her you
19 wanted to get back together with her; is that correct?

05:12 20 A. Yes.

21 MR. EKELAND: Objection. You can answer.

22 THE WITNESS: Yes.

23 Q. (By Ms. Peery) Did you move in together?

24 A. I can't hear if Tor had an objection or not.

05:12 25 MR. EKELAND: I'm good with that

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MELODY JOY CANTU and DR.)
RODRIGO CANTU,)
Plaintiffs,)
VS.) CIVIL ACTION
NO.: 5:20-CV-00746-JKP
(HJB)
DR. SANDRA GUERRA and)
DIGITAL FORENSICS)
CORPORATION, LLC,)
Defendants.)

REPORTER'S CERTIFICATION

DEPOSITION OF DR. RODRIGO CANTU

JULY 16, 2022

I, Debbie S. Longoria, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, DR. RODRIGO CANTU, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

I further certify that pursuant to FRCP Rule 30(f)
(1) that the signature of the deponent:

_____ was requested by the deponent or a party before
the completion of the deposition and returned within 30

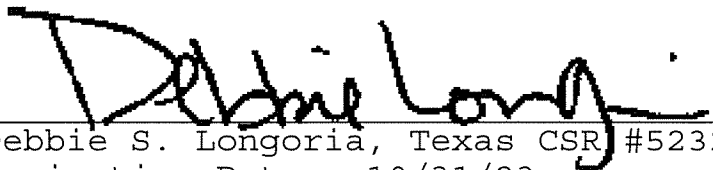
1 days from date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 X was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither attorney nor
7 counsel for, related to, nor employed by any of the
8 parties to the action in which this testimony was taken.

9 Further, I am not a relative or employee of any
10 attorney of record in this cause, nor do I have a
11 financial interest in the action.

12 Subscribed and sworn to on this the 28th day
13 of July, 2022.

14
15
16 

17 Debbie S. Longoria, Texas CSR #5232
18 Expiration Date: 10/31/23
19 Lexitas - Firm Registration No. 539
20 100 N.E. Loop 410, Suite 955
21 San Antonio, Texas 78216
22 (210) 481-7575
23
24
25